

**UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS BOARD  
REGION 13**

NAPLETON 1050, INC. D/B/A NAPLETON  
CADILLAC OF LIBERTYVILLE

and

INTERNATIONAL ASSOCIATION OF  
MACHINISTS & AEROSPACE WORKERS  
AFL-CIO

and

Cases 13-CA-187272  
13-CA-196991  
13-CA-204377

WILLIAM GLEN RUSSELL II, an Individual

**MOTION FOR EXTENSION OF TIME TO FILE POST-HEARING BRIEF**

Comes now RESPONDENT, Napleton Cadillac of Libertyville and, pursuant to NLRB Rules and Regulations Section 102.42 of the National Labor Relations Board's Rules and Regulations, and brings the following Motion for Extension of Time to File Post-Hearing Brief.

At the conclusion of the hearing in the above-captioned matter, Administrative Law Judge Goldman set the deadline for Post-Hearing Briefs on February 9, 2018.

The undersigned's 16-year old son has been critically ill and intermittently hospitalized at Golisano Children's Hospital. My son has required near constant care and I have been at his bedside at all times. Accordingly, I am respectfully requesting three additional weeks for filing a post-hearing brief in this matter, until March 2, 2018.

Brandon Anderson, counsel for Local 701, does not object to this request. Also, Counsel for the General Counsel does not oppose.

Respectfully submitted,

FREEBORN & PETERS LLP

By: /s/ Michael P. MacHarg

Dated: January 30, 2018

James F. Hendricks, Jr.  
Michael P. MacHarg  
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**CERTIFICATE OF SERVICE**

Pursuant to NLRB Rules and Regulations 102.113 and 102.114, I certify that before 5:00 p.m. on January 30, 2018, I served a portable document format (pdf) copy of Respondent's Motion for Extension of Time to File Post-Hearing Brief upon the Regional Director, Peter Sung Ohr, National Labor Relations Board, Region 13, 219 South Dearborn Street, Suite 808, Chicago, IL 60604, through the NLRB's electronic filing system.

On this same date, I certify that I served a copy of Respondent's Motion for Extension of Time to File Post-Hearing Brief upon the following, by electronic mail and and/or regular mail:

David Goldman, Administrative Law Judge, National Labor Relations Board (E-mail: [david.goldman@nlrb.gov](mailto:david.goldman@nlrb.gov))

Gary Shinnars, Executive Secretary, National Labor Relations Board (E-mail: [Gary.shinnars@NLRB.gov](mailto:Gary.shinnars@NLRB.gov)) (by electronic mail only)

Kevin McCormick and Emily O'Neill, National Labor Relations Board Region 13, 219 South Dearborn Street, Suite 808, Chicago, IL 60604

Rick A. Mickschl, (E-mail: [rmickschl@iamaw.org](mailto:rmickschl@iamaw.org)), International Association of Machinists and Aerospace Workers, 113 Republic Ave., Suite 100, Joliet, IL 60435

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/s/ Michael P. MacHarg

Dated: January 30, 2018

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